

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CONTRARIAN CAPITAL MANAGEMENT,
L.L.C., CONTRARIAN CAPITAL FUND I,
L.P., CONTRARIAN DOME DU GOUTER
MASTER FUND, LP, CONTRARIAN
CAPITAL SENIOR SECURED, L.P.,
CONTRARIAN EM II, LP, CONTRARIAN
EMERGING MARKETS, L.P., POLONIUS
HOLDINGS, LLC, and CONTRARIAN
FUNDS, L.L.C.,

Plaintiffs,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 19 Civ. 11018 [rel. Nos. 19
Civ. 3123 & 18 Civ. 11940]

Hon. Analisa Torres

PLAINTIFFS' NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated June 15, 2020, the accompanying Declaration of Justin M. Ellis, dated June 15, 2020, and the exhibits thereto, the Declaration of Lewis B. Schwartz, dated May 13, 2020 and the exhibit thereto, Plaintiffs' second revised statement of undisputed material facts pursuant to Local Rule 56.1 and the exhibits thereto served in this action on May 13, 2020, Defendant's response to the second revised statement of undisputed material facts pursuant to Local Rule 56.1 served in this action on May 20, 2020, the Supplemental Declaration of Lewis B. Schwartz, dated June 12, 2020, and all prior proceedings and papers in this action, Plaintiffs Contrarian Capital Management, L.L.C., Contrarian Capital Fund I, L.P., Contrarian Dome du Gouter Master Fund, LP, Contrarian Capital Senior Secured, L.P., Contrarian EM II, LP, Contrarian Emerging Markets, L.P., Polonius Holdings, LLC, and Contrarian Funds, L.L.C., by and through their

undersigned counsel, move the Honorable Analisa Torres, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, for an order granting summary judgment in Plaintiffs' favor on all of Plaintiffs' claims pursuant to Federal Rule of Civil Procedure 56, and for such further relief as the Court deems just, necessary, and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with the June 1, 2020 Scheduling Order entered in these actions, Dkt. 59: Defendant's opposition to the motion for summary judgment and Defendant's motion for a stay are to be filed by July 13, 2020; Plaintiffs' reply in support of their motion for summary judgment and Plaintiffs' opposition to Defendant's motion for a stay are to be filed by July 27, 2020; and Defendant's reply in support of its motion for a stay is to be filed by August 10, 2020.

Dated: June 15, 2020
New York, New York

Respectfully submitted,

/s/ Steven F. Molo

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